## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION

United States of America

ex rel. ALEX DOE, Relator,

The State of Texas

ex rel. ALEX DOE, Relator,

The State of Louisiana

ex rel. ALEX DOE, Relator,

Plaintiffs,

v.

Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., Planned Parenthood San Antonio, Inc.,

Defendants.

NO. 2:21-CV-00022-Z

Date: June 28, 2022

## <u>DECLARATION OF LEAH GODESKY IN SUPPORT OF DEFENDANTS'</u> <u>UNOPPOSED MOTION FOR LEAVE TO FILE DOCUMENT OUT OF TIME</u>

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## I, Leah Godesky, declare and state:

1. I am a partner at O'Melveny & Myers, LLP and counsel for Defendant Planned Parenthood Federation of America, Inc. ("PPFA") in the above-entitled action. I am a member in good standing of the State Bar of California, and I have been admitted *pro hac vice* in this case. Dkt. No. 96.

2. I make this declaration in support of Defendants' Motion for Leave to File

Document Out of Time.

3. On Friday, June 24, 2022, the Court ordered [DE 102], Defendants to respond to

Plaintiffs' Motion for Entry of Protective Order [DE 101] on or before 5:00 p.m. CDT, Monday,

June 27, 2022.

4. Upon receiving the Court's Order, counsel for PPFA immediately began working on

Defendants' Opposition to Plaintiffs' Motion. That work continued throughout the weekend and

into Monday.

5. Based on the Court's prior order [DE 12], Defendants redacted a portion of the

publicly filed copy of their Opposition [DE 103] in order to preserve the Relator's anonymity.

Defendants were prepared to timely file the Opposition, but technical issues arose in the process

of confirming that the redactions applied to the to-be-filed document were retained during the

conversion to PDF/A format. Defendants worked diligently to obtain that confirmation and filed

within a few minutes thereafter.

I declare under penalty of perjury of the laws of the United States that the foregoing is

true and correct.

Executed on June 28, 2022 in Los Angeles, California.

/s/ Leah Godesky
Leah Godesky

<sup>1</sup> This declaration refers to Defendants Planned Parenthood Gulf Coast, Inc. ("PPGC"), Planned Parenthood of Greater Texas, Inc. ("PPGT"), Planned Parenthood South Texas, Inc. ("PPST"), Planned Parenthood Cameron County, Inc. ("PP Cameron County"), and Planned Parenthood San Antonio, Inc. ("PP San Antonio"), together with PPFA, as "Defendants."